

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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ROBIN STEPHENS,

Plaintiff,

Case No. 07-CV-5614-VM

-against-

**CONSENT MOTION TO
ESTABLISH DEADLINE TO
RESPOND TO COMPLAINT**

**SUPER SHUTTLE, INC., SUPERSHUTTLE
INTERNATIONAL, INC., NEW YORK CITY
TRANSIT AUTHORITY,
MANHATTAN AND BRONX SURFACE
TRANSIT OPERATING AUTHORITY and
“JOHN DOE,” NYCT BUS DRIVER**

Defendants.

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Defendant SuperShuttle International, Inc. (“SuperShuttle”) hereby moves to establish the deadline for the SuperShuttle Defendants to respond to Plaintiff’s Complaint in this matter to August 13, 2007. In support of this motion, the SuperShuttle Defendants state as follows:

1. This is the first extension SuperShuttle has sought to respond to the Complaint and Plaintiff Robin Stephens consents to this request.
2. If granted, this extension would not affect any other scheduled dates in this matter.
3. As part of agreement allowing SuperShuttle to establish a deadline with the Plaintiff’s consent, SuperShuttle agreed to accept service of the Complaint, which service had not yet been completed. Because service of the Complaint on SuperShuttle had not been completed prior to that agreement, there was no deadline for SuperShuttle to respond to the Complaint prior to the parties’ agreement to seek approval for the August 13, 2007 deadline.
4. SuperShuttle did not receive a copy of the Complaint, which includes at least six counts against SuperShuttle, until the first week of June, 2007. Each of the counts against

SuperShuttle is grounded in a different statute or common law theory of liability. Given the complexity of the claims against SuperShuttle, SuperShuttle will need until August 13 to prepare its response to the Complaint.

5. This motion is made for valid reasons and is not interposed for purposes of delay.

6. The Plaintiff consents to this motion.

Dated: Washington, D.C.
June 20, 2007

By s/Thomas Earl Patton
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